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*Attorneys for Defendants Illuminate
Education, Inc. d/b/a Pupil Path*

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

ANASTASIYA KISIL, mother and natural
guardian of “JOHN DOE,” an infant,
individually and on behalf of others similarly
situated

Plaintiff,

v.

ILLUMINATE EDUCATION, Inc. d/b/a
PUPIL PATH,

Defendant.

CASE NO. 8:22-cv-01164-JVS-ADS

**JOINT STIPULATED REQUEST
TO CONTINUE RULE 26(F)
CONFERENCE AND RELATED
DEADLINES**

1 Pursuant to Local Rule 7-1 and this Court's Procedures, Plaintiff Anastasiya Kisil
2 ("Plaintiff") and Defendant Illuminate Education, Inc. ("Illuminate") (collectively, the
3 "Parties") hereby jointly stipulate and agree, subject to the approval of the Court, and for
4 good cause, to continue the Rule 26(f) Scheduling Conference and related deadlines in
5 anticipation of Plaintiffs' Consolidated Complaint. In support of this request, the Parties
6 state as follows:

7 1. Plaintiff filed a Complaint against Illuminate on June 4, 2022.

8 2. On July 13, 2022, the Court ordered that the Rule 26(f) Scheduling
9 Conference would take place on September 26, 2022. *See* ECF No. 33.

10 3. On August 9, 2022, the Parties notified the Court that Plaintiffs intended to
11 move to consolidate this matter with two other cases filed against Illuminate in federal
12 court—*Cranor v. Illuminate Education, Inc.*, No. 8:22-cv-01404-JVS-ADS (C.D. Cal.) and
13 *Chung v. Illuminate Education, Inc.*, No. 1:22-cv-03310-HG (E.D.N.Y.)—after the *Chung*
14 case had been transferred to C.D. Cal. *See* ECF No. 42. Plaintiffs also indicated that they
15 intended to file a motion to appoint lead counsel along with their consolidation request. *Id.*

16 4. On August 11, 2022, the Court issued an order granting the Parties' request to
17 continue then-current deadlines and ordered that Plaintiffs shall file a Consolidated
18 Complaint within 60 days of the Court's ruling on the motion to consolidate and/or
19 plaintiffs' motion to appoint lead counsel. *See* ECF No. 43.

20 5. Plaintiffs filed an unopposed motion to consolidate these cases on September
21 1, 2022, *see* ECF No. 44; that motion is currently pending before the Court.

22 6. Plaintiffs filed their stipulation to appoint lead counsel on September 2, 2022,
23 *see* ECF No. 45, and that stipulation was granted on September 7, 2022, *see* ECF No. 46.

24 7. Plaintiffs' consolidated complaint is therefore due on November 7, 2022.

25 8. The Parties have conferred and agree that it is impracticable for the parties to
26 hold the Rule 26(f) Scheduling Conference on September 26, 2022, because Plaintiffs will
27 not yet have filed a consolidated complaint. The Parties further agree that it will best serve
28 judicial economy to conduct the Scheduling Conference at a time when the Parties

1 understand the nature of the claims that Plaintiffs intend to assert against Illuminate, which
2 will be reflected in Plaintiffs' Consolidated Complaint.

3 9. WHEREFORE, the Parties respectfully request that the Rule 26(f) Conference
4 and related deadlines be continued as follows:

- 5 (a) The Parties will conduct the Rule 26(f) Conference on November 21, 2022.
6 (b) The Parties will file a Joint Rule 26(f) Report on December 5, 2022.
7 (c) The Parties will exchange Initial Disclosures on December 12, 2022.
8 (d) A Rule 26(f) Scheduling Conference will be held on December 19, 2022 at
9 10:30 AM PST, or at another time thereafter convenient for the Court.

10
11 Dated: September 16, 2022

12
13 /s/ Devin S. Anderson

14
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Co-Lead Interim Counsel for Plaintiffs

ATTESTATION PURSUANT TO CIVIL L.R. 5-4.3.4(a)(2)

The filer attests that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

DATED: September 16, 2022

/s/ Devin S. Anderson
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